

LEO FOX
ATTORNEY-AT-LAW

630 Third Avenue, New York, New York 10017
(212) 867-9595 Fax (212) 949-1857
E-Mail: leo@leofoxlaw.com

February 15, 2018

Honorable Michael E. Wiles
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, New York 10004-1408

Re: 15 John Corp.
Case No. 16-12453 (MEW)

Dear Judge Wiles:

I write this letter to oppose the request made in the statement submitted by Mr. Lajaunie for an adjournment of the February 21, 2018 Fee Application Hearing of my firm.

Mr. Lajaunie appears to raise two (2) issues, the first that he cannot appear on that day and the second a litany of what his complaints are to my Fee Application. I will address the first issue at this point which is relevant to the adjournment request. Because of the scope of the objection relating to his complaints to my Fee Application, I respectfully reserve the right to submit a Reply at a later date.

I selected February 21, 2018 after numerous discussions with Mr. Lajaunie, as partly reflected on the emails which Mr. Lajaunie attaches to his statement. Mr. Lajaunie claims in his statement at the second paragraph that he cannot appear in person or by telephone on February 21, 2018 for "professional" reasons. After repeated questions (see my emails dated January 22, 2018, January 23, 2018, January 24, 2018, January 29, 2018, February 5, 2018 and February 6, 2018), and after contending that he already had his return ticket to Wyoming on Saturday, February 17, 2018 after returning to New York from abroad, Mr. Lajaunie claims that on February 21, 2018 he is "following classes and taking exams, all of which have rigorous schedules" (PL email dated February 8, 2018 at 10:25 a.m.). No substantiation has been provided for this statement including what sort of classes and the nature of these exam deadlines, all the more necessary for Mr. Lajaunie to explain, particularly where he seems to spend very little time in Wyoming. Even if these classes were cooking classes, I submit that these are not professional reasons for not being

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able to appear. Mr. Lajaunie, in fact, concedes in his February 8, 2018 email (3:28 a.m.) that these are “personal” reasons and not “professional” ones.

Mr. Lajaunie indicated in a December 7, 2017 email to the Chapter 7 Trustee (attached Exhibit A), in connection with his scheduling difficulties to appear at a Section 341 Meeting that he was available on February 22, 2018 and February 23, 2018. We are willing to reschedule to either February 22, 2018 or February 23, 2018 subject to the Court’s availability.

In contrast, Mr. Lajaunie proposed March 29, 2018 or March 30, 2018. As I indicated on a number of different occasions to Mr. Lajaunie, I am flying on Wednesday night, March 28, 2018, to Israel for the Passover Holiday, arriving in Tel Aviv on the afternoon on Thursday, March 29, 2018 in a ten (10) hour flight (based on a six (6) or seven (7) hour time zone difference). I do not believe that I, as the proponent of the Fee Application, can properly defend my Fee Application on an international telephone call with a six (6) or seven (7) hour time difference, unlike the situation of one opposing the Fee Application.

For all these reasons, we respectfully request that this Court keep the February 21, 2018 date or adjourn to February 22, 2018 or February 23, 2018.

Very truly yours,

/s/ Leo Fox

LF:cb
Enclosure

cc: Richard Morrissey, Esq.
Neil Berger, Esq.

EXHIBIT A

Leo Fox

From: pl@firstadmininc.com
Sent: Tuesday, January 2, 2018 6:05 PM
To: Neil Berger; Leo Fox
Cc: Max Ferullo
Subject: RE: 15 John Corp.

Gentlemen,
A response to my email below would be greatly appreciated.
For information, Mr. Fox has not returned my personal funds, and has not communicated with me.
Thank you,
Regards,

PL

From: pl@firstadmininc.com
Sent: Thursday, December 7, 2017 2:07 PM
To: 'Neil Berger' <neilberger@teamtogut.com>; 'Leo Fox' <leo@leofoxlaw.com>
Cc: 'Max Ferullo' <mferullo@teamtogut.com>
Subject: RE: 15 John Corp.

Gentlemen,
Item #2 (2015 YE Balance Sheet, and YE P&L) was emailed to Mr. Fox (cc'd) today.
This completes the list of items that the Debtor is required to provide.
As per my email below, I am still unsure whether Mr. Fox has provided item #11 to your office.
In terms of the new date for the 341 Creditor Meeting, has the US Trustee communicated their availability?
Since Mr. Fox has not yet returned my personal funds that he is holding, I have no other choice but to be in NYC at the following dates:

- January 17, 18 and 19 (Wednesday, Thursday, Friday), 2017
- Thursday February 15, 2017
- Thursday and Friday February 22 and 23, 2017
- Assuming that Mr. Fox will have returned my personal funds at least two weeks before that date, I could be in NYC Monday March 12 to Thursday March 15, 2017.

Thank you,
Regards,

PL

From: pl@firstadmininc.com
Sent: Monday, December 4, 2017 1:09 PM
To: 'Neil Berger' <neilberger@teamtogut.com>; 'Leo Fox' <leo@leofoxlaw.com>
Cc: 'Max Ferullo' <mferullo@teamtogut.com>
Subject: RE: 15 John Corp.

Gentlemen,
Items #6 (four documents) and #7 (1 document) have been forwarded to Mr. Fox (cc'd).
Item #2 is the only remaining item which needs to be provided.
Item #11: unsure whether Mr. Fox has furnished this item.
Thank you,
Regards,

PL